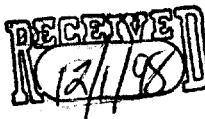


Office of Special Nutritionals (HFS-410) '98 DEC 18 AMO
Center for Food Safety and
Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, DC 20204



Re: Statements of Nutritional Support

Dear Sir:

Consider the following as notification of Statements of Nutritional Support as required under Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act (21 U.S.C. 343(r)(6)).

Distributor Name & Address: HealthWatchers System, Inc.
13402 North Scottsdale Road, Suite B-170
Scottsdale, Arizona 85254-4054


<u>Statement Text</u>	<u>Name of Subject Dietary Ingredient(s)</u>	<u>Brand Name</u>
"Helps promote capillary health"; "Helps to support energy production"; "Helps metabolize fat"; "Aids adrenal/heart functions"; "Supports healthy blood vessels"; "Promotes normal function of the thyroid and adrenal glands"; "Helps support and maintain the cardiovascular system"; "Helps you maintain a healthy lifestyle"; "May promote the natural and normal removal of vessel debris"; "May help regulate normal levels of homocysteine"; "Helps support important body functions"; "Energizer"; "Helps support healthy nerve function"; "Supports the circulatory system"; "Promotes a healthy heart"; "Enhances cardiovascular health";	Vitamin A, vitamin B6, vitamin B2, vitamin B12, vitamin B15, vitamin D, EDTA, fenugreek seed, superoxide dismutase, rutin, catalase, beet leaf, phosphatidyl choline, alfalfa, spanish moss, orchic hyaluronidase, vitamin C, vitamin E, pituitary, heart, liver, kidney, brain, phytin, riboflavin, pantothenic acid, urea, quercitin, butcher's broom and trace minerals.	Circulate

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<u>Statement Text</u>	<u>Name of Subject Dietary Ingredient(s)</u>	<u>Brand Name</u>
"May help nutritionally support healthy blood pressure and cholesterol levels"; "Helps stimulate the production of oxygen in the body"; "Helps to protect against cellular damage"; "Promotes calcium absorption for proper neuro-transmission at the myoneural junction synapse of the muscles"; "Enhances thymus gland function, thus helping support autoimmune system activity"; "Promotes normal gland activity of the liver, pancreas and gallbladder"; "Helps enhance normal glandular function"; "May help promote elimination of bodily waste materials and support cleansing of the kidneys"; "Helps support the function of the portal system"; "Helps support the neurohumeral (neuroendocrine) system"; "Helps transmit nutrients to body systems at the cellular level"; "Helps mop up free radicals".		

The information contained in this notice is complete and accurate. The above distributor can substantiate that the statements are truthful and not misleading.



Gary Martin
President
HealthWatchers System, Inc.

LAW OFFICE

WEAVER & AMIN

221 NORTH LA SALLE STREET, SUITE 764
CHICAGO, ILLINOIS 60601

KAREN A. WEAVER, R.P.H.

RAKESH M. AMIN, R.P.H.

(312) 701-0844

FAX (312) 781-9203

November 18, 1998

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, D.C. 20204

Re: Notification of Statements of Nutritional Support

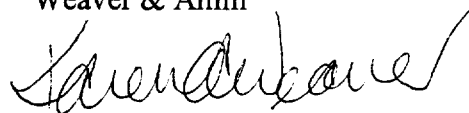
Dear Sir:

Enclosed is the original and two copies of an executed notification of Statements of Nutritional Support as required under section 101.93 of 21 Code of Federal Regulations and section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act, as Amended.

If necessary, please address future correspondence to our firm.

Very truly yours,

Weaver & Amin



Karen A. Weaver

enclosure

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